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March 13, 2020

VIA ECF

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Google LLC v. Fortress Investment Group, et al., No. 1:20-mc-00132-KPF (S.D.N.Y.)

Dear Judge Failla:

Petitioner writes to request leave to file redacted versions of Google's Reply in Support of its Motion to Compel Fortress Investment Group, Fortress Credit Co. LLC, and CF Uniloc Holdings LLC to Comply with Subpoenas on an Expedited Basis and Google LLC's Opposition to Respondents' Cross-Motion to Quash Google LLC's Subpoenas as well as the Declaration of Jonathan Tse submitted in connection with the Reply. The Reply and the Declaration include detailed information about the business arrangements and contractual relationships between Uniloc 2017, the party plaintiff in the underlying litigations, and the Respondents, as well as the Respondents' prior negotiations with third parties with respect to acquiring the asserted patents that were discovered during the course of discovery in the underlying litigations. The information sought to be redacted presumptively implicates Respondents' sensitive business interests and the proposed redactions are narrowly tailored to only those sensitive business interested potentially implicated.

Accordingly, Petitioner respectfully requests leave to file its Reply and Declaration in redacted form.

Respectfully submitted,

/s/ Joseph Milowic III

Joseph Milowic III
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SULLIVAN, LLP

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